

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

**TREVOR FITZGIBBON,**

**PLAINTIFF**

**vs.**

**JESSELYN A. RADACK,**

**DEFENDANT**

**Civil Action No. 3:19-cv-477-REP**

**MOTION TO REMOVE IMPROPER “COUNSEL’S EYES ONLY” DESIGNATION  
FROM PLAINTIFF’S SUPPLEMENTAL DISCOVERY PRODUCTION**

Defendant Jesselyn A. Radack (“Radack”), by counsel, files this Motion to Remove Improper “Counsel’s Eyes Only” Designation from Plaintiff’s Supplemental Document Production and in support thereof, respectfully refers the Court to the accompanying Memorandum in Support.

WHEREFORE, Jesselyn A. Radack respectfully requests that the Court grant the instant motion and enter the attached proposed Order.

Dated: May 31, 2020

Respectfully submitted,

/s/ D. Margeaux Thomas

D. Margeaux Thomas (VSB #75582)

The Thomas Law Office PLC

11130 Fairfax Blvd., Suite 200-G

Fairfax, VA 22030

Telephone: 703.957.2577

Facsimile: 703.957.2578

Email: mthomas@thomaslawplc.com

*Counsel for Defendant Jesselyn A. Radack*

**CERTIFICATE OF SERVICE**

I hereby certify that on May 31, 2020, a copy of the foregoing document was filed with the Court electronically. Notice of this filing will be sent automatically by the Court's CM/ECF system to the following parties:

Steven S. Biss  
300 West Main Street, Suite 102  
Charlottesville, VA 22903  
*Counsel for Plaintiff*

/s/ D. Margeaux Thomas  
D. Margeaux Thomas (VSB #75582)